

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE, LUKE LOE, RICHARD ROE, and  
MARY MOE, individually and on behalf of all  
others similarly situated,

*Plaintiffs,*

v.

THE TRUMP CORPORATION, DONALD J.  
TRUMP, in his personal capacity,  
DONALD TRUMP JR., ERIC TRUMP, and  
IVANKA TRUMP,

*Defendants.*

No. 1:18-cv-9936 (LGS)

**STIPULATION AND [PROPOSED] ORDER  
LIFTING PLAINTIFFS' PSEUDONYMITY**

**WHEREAS**, on December 20, 2018, the Court granted Plaintiffs' motion for leave to proceed under pseudonyms until a decision was rendered on Defendants' motion to dismiss, and ordered that Plaintiffs' motion may be renewed at that time (Doc. No. 54);

**WHEREAS**, the Court issued a decision on Defendants' motion to dismiss on July 24, 2019 (Doc. No. 97), and the parties made further submissions regarding the protection of Plaintiffs' identify information (Doc. Nos. 104 at 5 & n.4, 9; 104-1, & 104-2);

**WHEREAS**, the Court held a conference on September 5, 2019 following those submissions, and the Court entered a Protective Order on September 10, 2019, which provided, among other things, that "Plaintiffs should be referred to by their respective pseudonyms in all court filings" (Doc. No. 112 ¶ 7);

**WHEREAS**, on May 19, 2020, following further submissions from the parties (Doc. Nos. 257-59), the Court entered an order directing the parties to brief a motion for leave for Plaintiffs

to continue to proceed pseudonymously, with Plaintiffs' motion and memorandum of law in support due on June 9, 2020 (Doc. No. 266);

**WHEREAS**, on June 1, 2020, the Court stayed all deadlines in this case pursuant to an administrative stay entered by the U.S. Court of Appeals for the Second Circuit (Doc. No. 282), which terminated when the Second Circuit entered judgment on July 28, 2021 (2d Cir. Doc. No. 145); and

**WHEREAS**, on August 16, 2021, following the termination of the administrative stay, the Court ordered the parties to file a joint letter "providing an update as to whether motion practice is needed to resolve the issue of whether Plaintiffs may proceed pseudonymously" by August 27, 2021 (Doc. No. 321).

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned attorneys for Plaintiffs and Defendants in the above-captioned action, that:

(1) Within fourteen days from the date of this Order, Plaintiffs will file a Second Amended Complaint, substituting their real names for their pseudonyms and making no other changes to the Amended Complaint (Doc. No. 77);

(2) Defendants' motion to dismiss (Doc. No. 83) and Answer (Doc. No. 126) to the Amended Complaint shall be deemed to be filed against the Second Amended Complaint so that no amended pleading under Rule 15 of the Federal Rules of Civil Procedure, or further motion pursuant to Rule 12, is permitted without leave of the Court;

(3) Upon filing of Plaintiffs' Second Amended Complaint, the Clerk of the Court shall amend the caption of this action to replace Plaintiffs' pseudonyms, Jane Doe, Luke Loe, Richard Roe, and Mary Moe, with Plaintiffs' real names, as reflected in the Second Amended Complaint;

(4) This Stipulation and Order supersedes paragraph 18 of the Protective Order entered on September 10, 2019 (Doc. No. 112), and, following the filing of the Second Amended Complaint pursuant to paragraph 1 of this Order, the parties shall refer to Plaintiffs by their real names rather than their pseudonyms in all case-related documents, including, without limitation, in all future filings, discovery requests and responses, and correspondence; and

(5) The parties shall meet and confer regarding any amendments to the Protective Order (Doc. No. 112) that may be necessary to give effect to the lifting of pseudonymity.

/s/ Roberta A. Kaplan

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**IT IS SO ORDERED.**

Hon. Lorna G. Schofield, U.S. District Judge

Dated: August \_\_, 2021  
New York, New York